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Hon. George B. Daniels
United States District Court
for the Southern District of New York
500 Pearl Street, Room 1310
New York, New York 10007
(212) 805-6735

BY ECF

**Re: *In re Terrorist Attacks on September 11, 2001*, No. 1:03-md-01570-GBD-FM
(S.D.N.Y.) – Notice of Transcript Correction Request**

Dear Judge Daniels:

We represent defendant Dallah Avco and write to advise Your Honor of a transcript correction request we submitted in connection with the July 30, 2015 hearing (Dkt. 2986). Page 80 of the transcript quotes me as stating: “The issue is statements were made suggesting that Dallah Avco employed Omar al-Bayoumi. He was a technical or nominal employee, and the only point we wanted to make is that there hasn’t been any briefing on Saudi labor law.” In fact, what I stated was: “The issue is statements were made suggesting that Dallah Avco employed Omar al-Bayoumi, that he was a technical or nominal employee. And the only point we wanted to make is that there hasn’t been any briefing on Saudi labor law.” As I noted later in my remarks, Dallah Avco’s position is that there is no employment relationship between Omar al-Bayoumi and Dallah Avco at all – technical, nominal, or otherwise.

We raised this issue with the court reporter’s office upon receiving the transcript but were advised that the reporter would be on vacation until after Labor Day and that the issue could not be addressed until her return. Consequently, in light of the importance of this issue to our client and the pending motions argued at the hearing, we thought it prudent to advise Your Honor of the pendency of our request so there was no confusion over our client’s position in the interim.

Thank you for your time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'Robert Kry', with a stylized flourish at the end.

Robert Kry

cc: all counsel by ECF